

CORPORATE DISCLOSURE POLICY

1. INTRODUCTION

In developing this policy, AGX Group Berhad ("**AGB**" or "**the Company**") considered the recommendations contained in the Malaysian Code on Corporate Governance ("**MCCG**") as well as its disclosure obligations contained in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad ("**AMLR**").

This Corporate Disclosure Policy applies to all directors and employees of the Company and its subsidiaries (the "**Group**"). It describes the Company's strategy in determining and disseminating important information, particularly price-sensitive information, the conditions under which the information's confidentially would be maintained, and prohibitions against insider trading. It also establishes internal rules to assist implementation and ensure consistent disclosure procedures throughout the Group.

2. OBJECTIVE

To develop an effective strategy for communicating the corporate vision, strategies, developments, financial plans, and prospects to investors, the financial community, and other stakeholders in a fair and truthful manner, as well as obtaining comments from stakeholders.

The policy also aims to:-

- Create awareness and guidance for the Group's Board of Directors ("**Board**") and employees regarding the Company's disclosure duties and procedures;
- Ensure compliance with all applicable legal and regulatory obligations for the publication of material information;
- Establish and sustain positive relationships with all owners and stakeholders through active two-way communication;
- Promote and demonstrate a high level of integrity and transparency by providing timely, accurate, quality, and complete disclosure.

3. PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURES

a) Material information

- i. Material information is information about the Group that is reasonably expected to have a material effect on:
 - The market price or value of the Company's securities; or activity in the trading of its securities; or
 - The decision to buy, sell or continue holding the Company's securities which is made by an existing holder of those securities, or someone considering an investment in those securities.

- ii. The events which may require immediate disclosure are set out in Paragraph 9.04 of the AMLR and all amendments thereto from time to time by Bursa Securities and/or other regulators.
- iii. Materiality can be subjective, and the Company will take the approach of assessing the likely effect of the information on the price, scope of activities and financial position or performance of the Company's securities, in addition to whether the circumstances or events are measurable and would trigger the relevant thresholds in the percentage ratio calculations set out in the AMLR.
- iv. The threshold for Related Party Transaction and Recurrent Related Party Transaction are governed by Chapter 10 of the AMLR.
- v. The Company must immediately announce to Bursa Securities the events set out in Paragraph 9.19 of the AMLR and all amendments thereto from time to time by Bursa Securities and/or other regulators.

b) Responsibility to report on significant corporate developments

- i. It is essential that the Group Chief Executive Director and Executive Directors be fully informed of all the Company's developments that could potentially impact the disclosure process.
- ii. It is the responsibility of the Group Chief Executive Director to keep the Executive Directors fully apprised of all significant developments in the Company and Group so as to:-
 - Facilitate the determination of materiality, appropriateness and timing for public disclosure of the information, or whether the information should remain confidential;
 - Ensure appropriate understanding of significant developments and updates that may be relevant to on-going communication with the investing community; and
 - Avoid denying significant developments when, in fact, such developments are occurring.

c) Trading Halt and Suspension

In the event that the Board believes that a trading halt is necessary to maintain efficient trading of the Company's securities and that the news or material information is better understood and widely disseminated, the Company may request Bursa Securities for a suspension in the trading of the Company's securities, so that an announcement can be made.

4. IR Structure and Responsibility

The Company has established the following IR structure and responsibility for the implementation of the IR programme and strategy:-

Authorised Spokesperson:

Chairman of the Board of Directors
The Group Chief Executive Director
The Chief Financial Officer

The authorised spokesperson has been appointed to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial results and plans, operational matters, etc.

All such inquiries should be referred to the appropriate Authorised Spokesperson. If there is any doubt about the appropriateness of supplying information to an external party, the officers and personnel should contact the Spokesperson for advice.

5. MODE OF DISCLOSURE

The Company uses a variety of communication channels to distribute information about itself. These would include:

- Electronic facilities provided by Bursa Securities;
- Press releases;
- Corporate website;
- Emails;
- Oral statements made in group meetings and individual meetings with members of the investment community (which include analysts, investors, investment dealers, brokers, investment advisers and investment managers) or with employees;
- News conferences, road shows, industry events and investor conferences; and
- Annual General Meetings / Extraordinary General Meetings.

Any public disclosure of relevant information must be made by an announcement to Bursa Securities, the press, and newswire services. The Company will not disseminate any material information to the media, including under embargo, until it has provided the information to Bursa Securities.

6. IR PROGRAMME AND STRATEGIES

The Company has the following programmes and strategies in place to bridge and enhance the relationship with investors or potential investors:-

a. Announcement of Material Information and Press Release

After the approval from the Group Chief Executive Director or Chief Financial Officer or senior personnel on releasing material information is obtained, an announcement is made to Bursa Securities and/or a company press release will be issued to all major newspapers.

b. Annual General Meeting or Extraordinary General Meeting and Press Conference

The Annual General Meeting / Extraordinary General Meeting / Press Conference is held to communicate with the shareholders on the Company's performance, strategy, proposed corporate exercises, outlook, operational matters and other relevant matters that are of interest to shareholders.

c. Annual and Quarterly Financial Reports

The Annual Report and quarterly financial reports are submitted to Bursa Securities and made available on the Company's official website.

d. Meetings or Interviews with Investors, Analysts and Media

The spokesperson will meet with the shareholders, analysts, or media to update them on the Company's performance, strategy, development, etc.

e. Participate in IR Web Portal

To reach out to present and future investors, the company has created a corporate website, which includes an IR section.

7. REPORTS AND RUMOURS

a. Analysts' reports

It is the Company's policy not to provide focused guidance to analysts in their efforts to develop their financial reports or earnings estimates of the Company. The Company will point out factual errors or assumptions that are inconsistent with previously announced information.

b. Rumours

It is the Company's policy not to respond to or comment on market rumours and speculation, unless they appear to contain material information or misinformation, or may be reasonably expected to affect the price of the Company's securities or trading activity in those securities.

The Company shall carry out enquiry and if appropriate, immediately or as soon as possible publicly clarify, confirm or deny any circulating market rumours upon becoming aware of the presence of any material information. Any clarification provided

will be in a published format through Bursa Securities, for the purpose of dissemination to the investing public.

8. UNUSUAL MARKET ACTIVITY

Where unusual price movement, trading activity, or both (“unusual market activity”) occurs, the Company shall immediately undertake due enquiry to ascertain the cause of unusual market activity in its securities. If the unusual market activity results from a leak of previously undisclosed information, the Company shall disclose the information in accordance with AMLR; if it results from a rumour or report, the Company shall issue a clarifying announcement in accordance with AMLR and this policy.

If the Company is unable to discover the reason for the unusual market activity, the Company shall announce to Bursa Securities that there were no unreported developments that contributed to the unusual market activity.

9. PROMOTIONAL DISCLOSURE ACTIVITY

Guided by the principles of fairness and transparency, the Company shall not participate in any promotional disclosure activity that may have a misleading effect on its investors or cause unwarranted activity within its securities.

10. OBTAINING FEEDBACK

The company has established various channels for shareholders and stakeholders to give comments and objections. When developing its corporate strategy, the company will take into account all relevant remarks and feedback collected.

11. MAINTAINING CONFIDENTIALITY

Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by law (provided always that the employee must give prior notification to the Company if he/she is compelled by law to make disclosure). Efforts will be made to limit access to such confidential information to only those who “need to know” the information.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else. Management shall ensure that such outside parties confirm their commitment to non-disclosure under a written confidentiality agreement.

The Company will only withhold material information from the public for legitimate business or regulatory purposes. These include:-

- When immediate disclosure would prejudice the ability of the Company to pursue its corporate business objectives;

- When the facts are in a state of flux and a more appropriate timing for disclosure is imminent; and
- Where company or security laws restrict such disclosure.

12. INSIDER TRADING

A person is an “insider” if that person:

- a) possesses information that is not generally available which on becoming generally available a reasonable person would expect it to have a material effect on the price or the value of the securities; and
- b) knows or reasonably ought to know that the information is generally not available.

Insiders must not trade on the basis of material information which is not known to the investing public.

The relevant provisions of the Capital Markets and Services Act 2007 in regard to insider trading apply to all Insiders.

13. PERIODIC REVIEW

The policy shall be reviewed periodically and may be amended by the Board as it deems appropriate.

14. IR CONTACT DETAILS

Email : corporate@agxlogistics.com
Tel : +03-8023 1311

This policy was reviewed, approved and adopted by the Board of Directors on 26 April 2024.